

REMARKS

In response to the Office Action mailed October 19, 2004, the Applicants have amended claims 1, 4, 7, 9, 10, 11, 14, 16, 17, 35, and 39. Claims 19-34 were previously withdrawn. Claims 1-18 and 35-40 are presented for examination.

The Examiner has rejected claims 1-3, 5-6, 8-9, 15-16, and 18 under 35 U.S.C. §102(e) as being anticipated by *Champlin* (US 6,519,635). The Examiner has also rejected claims 4, 7, 10, 14, and 17 under 35 U.S.C. §103(a) as being unpatentable over *Champlin* in view of *Pan* (US 6,775,701).

As best understood, the Examiner considers the lookup table 70 to include “metadata descriptive of data stored” in database 76. However, what one finds in the lookup table 70 is not “metadata” because it fails to actually describe anything in database 76. Table 70 contains no more than a correspondence between MIB object identifiers and data record elements (col. 5, lines 21-27).

By way of analogy, it is as if one had a table that listed words in English and corresponding words in Latin. From such a table, one might learn that “water” corresponded to “aqua.” However, one could not learn, from that table, *anything* about the familiar properties of water. This is because such a table would lack information that actually *describes* water, i.e. “metadata”.

Applicant's auxiliary MIB 22 contains metadata that actually *describes* data in the local MIB 16. This provides functionality that transcends that provided by a simple look-up table, in which one merely substitutes one command for another by looking up commands in a process *Champlin* himself refers to as merely being a “blind translation.” As but one example of such transcendent functionality, Applicant describes:

In collecting statistics from the managed node 14a, it is more efficient to issue a single request for a report rather than to issue a sequence of requests for each individual statistic within the report. To accomplish this, the auxiliary MIB 22 includes all OIDs that identify statistics to be retrieved when the management station 12 requests a report. Upon receiving a COPS-PR communication requesting a report, the shim layer 20 searches the auxiliary MIB 22 for all OIDs associated with a request of that type. The shim layer 20 then formulates the

individual calls to the API of the SNMP agent 18 to carry out the request. This enables the network management station 12 to issue what amounts to a macro instruction and to have the shim layer 29 decompose that macro instruction into its elementary parts (*see* Applicant's specification page 5).

This enhanced ability to translate comes about precisely because the local MIB 16 contains more than a mere one-to-one correspondence between commands in one protocol and those in another. It contains "metadata." *Champlin's* table 70 cannot correspond to the claimed first database because table 70 lacks "metadata descriptive of data stored in a second database," as recited in the applicant's claim 1.

Claims 2-8 depend from claim 1 and are patentable for at least the same reasons as claim 1. Claim 9 recites the limitation "a first database having metadata descriptive of data stored in a second database" which is similar to the limitation of claim 1 described above. Therefore, claim 9 is patentable for reasons similar to those provided above in relation to claim 1. Claims 10-18 depend from claim 9 and are patentable for at least the same reasons as claim 9.

The applicant submitted a preliminary amendment on October 18, 2004 prior to the mailing of the first office action on October 19, 2003. The applicant requests that the examiner provide an examination of claims 35-40, which were added in the preliminary amendment.

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.


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Respectfully submitted,

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